

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DEREK KHANNA, individually and derivatively )  
on behalf of Shimbly Corporation, )  
Plaintiff, )  
v. ) Case No. 21-cv-5752  
KATELYNN BANKS, )  
ISELLMLS.COM, INC. d/b/a CINDY BANKS )  
TEAM, CINDY BANKS, TONY BANKS, ) Hon. Judge Virginia M. Kendall  
EIRIK SOMERVILLE, MARYAM HUSSEIN ) Magistrate Judge  
RICHARD CARY and PAMELA CARY, ) Keri Holleb-Hotaling  
Defendants, and )  
SHIMBLY CORPORATION, a Delaware )  
corporation )  
Nominal Defendant. )  
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)

**PLAINTIFF'S MOTION FOR VOLUNTARY DISMISSAL**

Plaintiff Derek Khanna (“Plaintiff” or “Khanna”), by and through his undersigned counsel, moves this Court to dismiss, under Fed. R. Civ. P. 41(a)(2), *without prejudice*, his claims against Richard Cary and Pamela Cary.

Plaintiff, by his attorney,

/s/ Ryan P. McLane  
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